

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Chapter 13
	:	
JOSEPH L. MILLER	:	6/13/02, 9:30 A.M.
REBECCA L. MILLER	:	Courtroom # 3
	:	
	:	Case No. 12-20116

ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY

1. Admitted.
2. Admitted
3. Admitted.
4. Denied. It is specifically denied that debtor has failed to tender payments consistent with the terms of the mortgage and note.
5. Denied. It is specifically denied that debtor has failed to tender payments consistent with the terms of the mortgage and note.
6. Admitted.
7. Denied. Debtor denies that he has failed to make the stated payments as listed and avers that Movant is holding payment(s) in abeyance without crediting his account.
8. No response required.
9. Denied.
10. No response required.
11. No Response Required.

WHEREFORE, it is requested that this Honorable Court DENY and DISMISS movant's Motion for Relief from the Automatic Stay, or in the alternative approve a stipulation permitting the Debtor to repay any outstanding arrears over an agreed upon period of time.

Respectfully Submitted,

YOUNG, MARR & ASSOCIATES

By: /s/ Paul H. Young
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